

**EXHIBIT B**

Joey P. San Nicolas, Esq. (F0342)  
SAN NICOLAS LAW OFFICE, LLC  
2nd Floor, ICCI Bldg. (Middle Road)  
P.O. Box 10,001 PMB 602  
Saipan, MP 96950  
Telephone No. (670) 234-7659 (SNLW)  
jpsn@sannicolaslaw.net

Kevin T. Abikoff (*Pro Hac Vice*)  
Samuel W. Salyer (*Pro Hac Vice*)  
HUGHES HUBBARD & REED LLP  
1775 I St. N.W.  
Washington, D.C. 20006  
Telephone: (202) 721-4600  
Facsimile: (202) 721-4646  
kevin.abikoff@hugheshubbard.com  
samuel.salyer@hugheshubbard.com

*Attorneys for Defendant Imperial Pacific International (CNMI), LLC*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS**

SARDINI GROUP, INC,

Plaintiff,

v.

IMPERIAL PACIFIC INTERNATIONAL  
(CNMI), LLC,

Defendant.

CASE NO. 1:20-cv-00007

**DEFENDANT’S WITNESS LIST**

Defendant Imperial Pacific International (CNMI), LLC (“IPI”), by and through their undersigned counsel, hereby serve this witness list along with the parties Proposed Joint Final Pretrial Order and pursuant to Local Rule 16.6. As stated in section 7.c of the Proposed Joint Final Pretrial Order, Defendant reserves the right to modify and supplement this Witness List prior to the Final Pretrial Conference, including the right to withdraw any witnesses. Defendant reserves the right to call any witnesses identified in Plaintiff’s Witness List. Defendant also reserves the right to call,

**EXHIBIT B**

upon appropriate application to the Court, if required, witnesses not listed below for the purpose of authenticating exhibits, to the extent the parties are unable to reach agreement regarding such issues. Defendant reserves the right to supplement this list to include witnesses to rebut the testimony of any witnesses subsequently disclosed by Plaintiff.

Defendant hereby identifies the following Fact Witnesses, whose testimony may be elicited at trial. The subject matters identified herein are stated to the best of Defendant's current ability and do not limit or restrict the subject matter of the testimony that may be offered by or elicited from such witnesses.

<b><u>No.</u></b>	<b><u>Name</u></b>	<b><u>Address</u></b>	<b><u>Expected Testimony</u></b>
1	Tao Xing	Imperial Pacific International (CNMI) LLC c/o Hughes Hubbard & Reed LLP	Mr. Xing may testify as to the construction plan and progress on IPI's Imperial Palace Resort ("IPR") project, construction and other services performed by third parties, IPI's contract negotiation and processes, IPI's records regarding agreements with and payments to Plaintiff and other third parties.
2	Frances Mafnas	Imperial Pacific International (CNMI) LLC c/o Hughes Hubbard & Reed LLP	Ms. Mafnas may testify as to IPI's payment records, agreements with third-parties, payment processes, record-keeping, invoice processing, and records of agreements and payments related to Plaintiff and other third parties.
3	Anejandro Gamab	Imperial Pacific International (CNMI) LLC c/o Hughes Hubbard & Reed LLP	Mr. Gamab may testify as to IPI's payment records, agreements with third-parties, payment processes, record-keeping, invoice processing, and records of agreements and payments related to Plaintiff and other third parties.
4	Eric Poon		Mr. Poon may testify as to the construction plan and progress on IPI's IPR project, construction and

			other services performed by third parties, IPI's records regarding agreements with and payments to Plaintiff and other third parties.
5	Kafun Ho	Imperial Pacific International (CNMI) LLC c/o Hughes Hubbard & Reed LLP	Mr. Ho may testify as to the construction plan and progress on IPI's IPR project, construction and other services performed by third parties, IPI's records regarding agreements with and payments to Plaintiff and other third parties.
6	MK Lee		Mr. Lee may testify as to IPI's negotiations and contract with Shanghai Chinafu Structural Design Inc. ("Chinafu"), the services performed by Chinafu, Qing (Steve) Zuo's relationship with Chinafu, services performed by Mr. Zuo, IPI's payments to Chinafu, claims made by Chinafu and Mr. Zuo, negotiations between IPI and Plaintiff, the value of the services claimed to have been performed by Plaintiff, IPI's processes for requesting services from contractors.

DATED this 8th day of July, 2022.

By: \_\_\_\_\_  
Kevin T. Abikoff (*Pro Hac Vice*)  
Samuel W. Salyer (*Pro Hac Vice*)  
HUGHES HUBBARD & REED LLP  
1775 I St. N.W.  
Washington, D.C. 20006  
Telephone: (202) 721-4600  
Facsimile: (202) 721-4646  
kevin.abikoff@hugheshubbard.com  
samuel.salyer@hugheshubbard.com

Page 3 of 4

**EXHIBIT B**

Joey P. San Nicolas, Esq. (F0342)  
SAN NICOLAS LAW OFFICE, LLC  
2nd Floor, ICCI Bldg. (Middle Road)  
P.O. Box 10,001 PMB 602  
Saipan, MP 96950  
Telephone No. (670) 234-7659 (SNLW)  
jpsn@sannicolaslaw.net

*Attorneys for Defendant Imperial Pacific International  
(CNMI), LLC*